

GENERAL DATA PROTECTION REGULATION (GDPR) POLICY – CLIENT FACING

This privacy policy sets out how Global Voices uses and protects any information that you give us when you use our services in compliance with the General Data Protection Regulation (GDPR - Regulation (EU) 2016/679). This policy is applicable from 25th of May 2018 and covers all our brands: Global Voices, London Translations, Global Voices Media and Gemini Translations from now referred to as “The Company”, and their associated products and services.

The Company is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy statement.

This Privacy Policy may change from time to time based on changes made to the EU Standard Contractual Clauses and/or the Privacy Shields. Any changes made necessary will be reflected in an update to this policy and disseminated.

What we collect

We may collect and record the following information:

- name and job title
- contact information including telephone, email and postal address
- details of preferences and company specific requirements
- information from customer surveys

The purpose and legal basis for processing

We will only use your data where we have a “lawful basis” for processing this information. These are defined by the GDPR as:

1. Consent
2. Contractual necessity
3. Legal obligation
4. Legitimate interests

What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- We need to keep internal records as a contractual necessity.
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new services, special offers or other information which we think you may find interesting using the email address which you have provided.
- Occasionally, we may also use your information to contact you by email or phone for market research purposes.

Freelance suppliers

The Company utilises a network of over 5,000 freelance suppliers to assist in the process of translation. They may receive, as part of the assignment, the name of the client they are working with but no Personal Data about that client, unless such contact information is needed to perform the assignment (such as the cases of onsite interpretation projects, onsite document review, etc.). Freelance suppliers may also have access to the Personal Data within the source documents and reference material sent to them for translation. However, in all cases, the suppliers will be subject to confidentiality undertakings in which they undertake to keep such information confidential and only use it to fulfil the allocated projects in line with our general agreements and any project-specific instructions. All suppliers who will be processing Personal Data are also required to sign the EU Standard Contractual Clauses.

All freelance suppliers are required to sign an EU Data Protection Agreement prior to working with the Company. This document addresses common requirements concerning Notice, Choice, Onward Transfer, Access, Security, Data Integrity and Enforcement of the Personal Data with respect to the supplier's Personal Data. Any supplier has the right to terminate their working relationship with the Company and request the deletion of Personal Data pertaining to them. However, the Company will maintain its business records in such a way that it may retain the historical knowledge and relationships concerning any legal or regulatory inquiries which may later arise. This practice is in the best interests of both parties so that identifying information relating to a particular matter is accessible but sufficiently discrete so that the Company does not accidentally contact them for projects in the future.

Choice

The Company's clients have the choice concerning what Personal Data is accessed, used or retained. In order to conduct business with our clients it is necessary to maintain contact information and specific billing information, but the extent of the information stored can always be discussed with a responsible Account Manager. Additionally, if there is a specific concern about the Personal Data found in the information provided to process a language services project (such as source, reference material, etc.), we recommend redacting this information prior to sending it to the Company or discussing alternative solutions with your Account Manager. In addition, other steps may be taken which may include the forced anonymisation of information and limitation of translation efforts to de-identified data only.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

Controlling your personal information

If you have previously agreed to us using your personal information for direct marketing purposes, you may withdraw your consent at any time by emailing us requesting to opt out.

We will not sell or share your personal data to third parties unless we are required by law to do so.

You may request details of personal information which we hold about you under the GDPR. You have the right to request deletion of your personal data.

If you believe that any information we are holding on you is incorrect or incomplete, you can inform the Company as soon as possible so it can be updated.

Your data processor is Global Voices, registered in the UK (Company Number SC270103), Innovation Park, Stirling FK9 4NF, email: sdpo@globalvoices.com, tel: +44 845 130 1170. Data protection officer: Luigi Koechlin.

Global Voices is registered with the Information Commissioner's Office - Certificate Number Z2244407.



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